#### REMARKS

This amendment is being filed together with a request for continued examination.

Claims 1-17 were in this application prior to this amendment.

New dependent claims 18 and 19 have been added.

Claims 1 and 9 have been amended.

Claims 1-19 are presently in this application.

Reconsideration and allowance of claims 1-19 as amended is respectfully requested.

### Claim Rejections - 35 U.S.C. § 102

In paragraph 2 of the office action, claims 1, 2, 5, 8, 9,10, 12, 13 and 15-17 were rejected under 35 USC 102(e) as being anticipated by Lahey et al. (US Patent No. 6,587,217).

Independent claims 1, 9 and 12 will be discussed first and then the dependent claims 2, 5, 8, 10, 13 and 15-17 will be discussed.

Applicant's Invention is directed to a system wherein a generic document processing client locates a designated device (for example a printer) and acts as an interface between the device and a user application (see applicant's specifications page 5 lines 3-7). Once the generic document-processing client *locates* the device, it accesses the various operational settings available to the user, typically in the form of a network interface, such as a web page. Thus, the application system activates an interface using a process that includes 'locating' and 'accessing.' More specifically applicant's system activates an interface to a document processing

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device by a process that <u>locates</u> the predetermined document processing device and then it <u>accesses</u> an operational setting of the predetermined document processing device.

## Claim 1 as amended reads in part:

"activating an interface between a predetermined document processing device and a workstation by locating the predetermined document processing device and accessing an operational setting of the predetermined document processing device; providing at least one user interface to a user at the workstation, wherein the interface allows the user to select the operational setting[s] for the predetermined document processing device."

Applicant submits that the Lahey reference does not teach <u>activating an interface</u> between a predetermined document processing device and a workstation; by <u>locating</u> the predetermined document processing device and <u>accessing</u> an operational setting of the predetermined document processing device" as required by claim 1.

Instead, Lahey at lines 15-31 of column 7 discusses a method involving the following steps: "create the Job ticket;" "translates the job ticket;" "transmits this translated job ticket... to the InfoPrint MPC Server;" "process the transmitted items and generate printer files;" "selects an appropriate printer;" and "transmits the printer files to the selected printer for printing." In short, Lahey teaches creating, translating, translating, processing, generating, and selecting in this section. Lahey does not

teach locating the predetermined document processing device and accessing an operational setting of the predetermined document processing device.

Since Lahey does not teach the steps recited in claim 1, reconsideration and allowance of claim1 is respectfully requested.

Claim 9 includes the same limitation as quoted above relative to claim 1. Thus, applicant submits that claim 9 is allowable for the same reason as discussed above relative to claim 1. Reconsideration and allowance of claim 9 is therefore respectfully requested.

#### Claim 12 recites in part:

"a generic document processing client installed on at least one workstation connected to a network, wherein the document processing client is operable to interact with several different types of document processing devices;

at least one document-processing device, operable to receive a location of the document data files and auxiliary information associated with each document data file from the document-processing client".

Applicant submits that Lahey does not teach a "document processing client ... operable to interact with several different types of document processing devices" as recited in claim 12. Stated differently, claim 12 requires a client that interacts with several different types of document processing devices instead of a client such as that shown in Lahey that interacts with a singular document processing device.

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The Examiner cites Lahey lines 15-31 of column 7 relative to claim 12. Lahey only refers to two potential document processing devices in this section and neither of them meet the definition specified in claim 12. The first device referred to in Lahey is the InfoPrint MPC Server. However, Lahey lines 20-25 of column 7 specifically states that the InfoPrint Submit software translates the job ticket to a format compatible with the InfoPrint MPC Server and furthermore this translated job ticket is transmitted to the InfoPrint MPC Server. Therefore Lahey teaches that the InfoPrint Submit software is operable singularly with the InfoPrint MPC Server and not with several different types of document processing devices as required in claim 12.

The second device referred to in Lahey is a printer connected to the InfoPrint MPC Server as mentioned in Lahey lines 28-31 of column 7. However claim 12 also requires the document processing device to be "operable to receive a location of the document data files." This requirement of claim 12 is not met by the device in Lahey. Lahey does not teach the sending of the location of a document data file to the printer, but instead Lahey teaches one to send the printer file itself (see lines 30-31 of column 7 of Lahey). Thus the printer in Lahey does not qualify as a claim 12 document processing device.

Since Lahey does not teach a system a document processing client operable to interact with several different types of document processing devices as required by claim 12, reconsideration and allowance of claim12 is respectfully requested.

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Dependent claims 2, 5, 8, 10, 13 and 15-17 were also rejected in paragraph 2 of the office action. Applicant submits that dependent claims 2, 5, 8, 10, 13 and 15-17 are patentable for the same reason as discussed above relative to their parent claims. Reconsideration and allowance of claims 2, 5, 8, 10, 13 and 15-17 is therefore respectfully requested.

# Claim Rejections - 35 U.S.C. § 103

In paragraphs 12 of the office action dependent claims 3, 4, and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lahey in view of Yokoyama (U.S. Patent No. 6,166,826).

Claims 3, 4 and 7 depend on claim 1 and thus the limitations discussed above relative to claim 1 are included in these claims. The above discussion of the difference between Lacey and claim 1 applies equally to these claims in that these claims are dependent on claim 1.

The Yokoyama reference describes a system that includes storage unit for storing the print data. A file conversion unit converts the file stored in the storage unit into an image data file. An image file transfer unit transfers image data files to a source that issues an image data file transfer request. A reprint unit reads the file stored in the storage unit and causes the print unit to print the file.

The system described in the Yokoyama reference enables a user to check image data of files so that erroneous printing can be prevented. The Yokoyama system

also enables a user to check the contents of stored files and to check the file contents.

In order to accomplish the above Yokoyama's system first transfers file attribute information of stored files, next the image data of files which are selected based on the attribute information transferred, so that a user can check desired files.

There is nothing in Yokoyama that suggests

"activating an interface ...... by <u>locating</u> the predetermined document processing device and <u>accessing</u> ..... an operational setting of the predetermined document processing device; "

as recited in claim 1 upon which claims 3, 4 and 7 depend.

Since neither Lacy of Yokoyama teach the limitations in the base claims upon which claims 3, 4 and 7 depend, reconsideration and allowance of claims 3, 4 and 7 is requested.

In paragraph 15 of the Office Action, dependent claims 6, 11, and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lahey in view of Shima (U.S. Patent No. 6,522,816).

Claims 6, 11 and 14 respectively depend on claims 1, 9 and 12 and thus the limitations discussed above relative to claims 1, 9 and 12 are included in these claims. The above discussion of the difference between Lacey and claims 1, 9 and 12 therefore applies equally to claims 6, 11, 14.

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Shima teaches a method of managing multiple print jobs using a printer or a print server that receives and stores print requests originating from one or more host computers. The print requests contain the location of the data associated with each print request but they do not contain the data itself. The printer or print server is able to process each print request by first requesting from the appropriate host computer the data. This technique described in Shima allows the printer or print server to process multiple print requests In any desired order as opposed to the usual method of printing jobs on a first-come, first-served basis. Shima does not teach or suggest the use of a generic document processing device as claimed by the applicant.

The method and system recited in applicant's claims eliminates the need for specific printer drivers by utilizing a generic document processing device client, thus differing from the teachings of Shima.

There is nothing in Shima that suggests:

"activating an interface ...... by <u>locating</u> the predetermined document processing device and <u>accessing</u> ..... an operational setting of the predetermined document processing device; "

as recited in claim 1 and 9 upon which claims 6 and 11 depend.

Furthermore, there is nothing is Shima that suggests:

"a generic document processing client ...... operable to interact with several different types of document processing devices".

as recited in applicant's claim 12 upon which claim 14 dependes.

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Since neither Lacy or Shima teach or suggest the combination recited in applicant's claims 6, 11 and 14, reconsideration and allowance of claims 6, 11 and 14 is respectfully requested.

Conclusion: Since the references do not teach the inventions as recited in applicants claims 1-19, reconsideration and allowance of claims 1 to 19 is respectfully requested.

The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that a telephone interview would be helpful in advancing the allowance of this application.

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Respectfully submitted,

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